

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**

LINDA FAIRSTEIN,  
  
Plaintiff,  
  
v.  
  
NETFLIX, INC., AVA DUVERNAY,  
and ATTICA LOCKE,  
  
Defendants.

Case No: 2:20-cv-00180-TPB-NPM

**DECLARATION OF JOANNE SINCHUK**

I, Joanne Sinchuk, declare as follows:

1. I am the manager of the Murder on the Beach Mystery Bookstore located at 104 West Atlantic Avenue, Delray Beach, Florida 33444.
2. Linda Fairstein has personally appeared more than fifteen (15) times at Murder on the Beach to promote various novels she has written. Ms. Fairstein's last appearance was on April 2, 2019 for her launch of *Blood Oath*.
3. Although Linda Fairstein's novels were formerly sold at Murder on the Beach, the bookstore does not currently have any new copies of Ms. Fairstein's books available for sale.
4. If a customer were to request to purchase one of Ms. Fairstein's novels, I am unable to order the book from either the publisher, Penguin Random House, or our national book distributor, Ingram, because the publisher, Penguin Random House, no longer makes the books available for sale.
5. Thus, I am unable to sell new copies of Linda Fairstein's novels at Murder on the Beach.

**Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing  
is true and correct.**

Executed on this 15 day of June, 2020.

  
JOANNE SINCHUK